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17 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
18 REED, and COASTAL PROTECTION
RANGERS, INC.
19

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
22

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
individual; and COASTAL
25 PROTECTION RANGERS, INC., a
26 California non-profit public benefit
corporation,
27

28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' OBJECTIONS TO
DEFENDANT CHARLIE FERRARA'S
EVIDENCE IN SUPPORT OF
MOTION FOR SUMMARY
JUDGMENT, OR IN THE
ALTERNATIVE FOR SUMMARY
ADJUDICATION OF CLAIMS**

Case No. 2:16-cv-02129-SJO (RAOx)

PLTFs.' OBJECTIONS TO DEFT. CHARLIE FERRARA'S EVIDENCE IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT, OR IN THE ALTERNATIVE FOR SUMMARY ADJUDICATION OF CLAIMS

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v.

LUNADA BAY BOYS; THE INDIVIDUAL MEMBERS OF THE LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT BLAKEMAN, ALAN JOHNSTON AKA JALIAN JOHNSTON, MICHAEL RAE PAPAYANS, ANGELO FERRARA, FRANK FERRARA, CHARLIE FERRARA, and N. F.; CITY OF PALOS VERDES ESTATES; CHIEF OF POLICE JEFF KEPLEY, in his representative capacity; and DOES 1-10,

Defendants.

Judge: Hon. S. James Otero
Date: September 5, 2017
Time: 10:00 a.m.
Crtrm.: 10C

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

Plaintiffs Cory Spencer, Diana Milena Reed and Coastal Protection Rangers, Inc. (collectively referred to as "Plaintiffs") hereby object to the following evidence presented by Defendant Charlie Ferrara ("Defendant") in connection with Defendant's Motion for Summary Judgment or, in the Alternative, Summary Adjudication set for hearing on September 5, 2017, before this Court:

A. OBJECTION TO EXHIBIT N (DECLARATION OF LEO FRANK FERRARA) TO THE DECLARATION OF TIFFANY BACON IN SUPPORT OF CHARLIE FERRARA'S MOTION FOR SUMMARY JUDGMENT.

<u>Evidence:</u>	<u>Objections:</u>
1. Declaration of Leo Ferrara.	1. This evidence is inadmissible because it was not timely disclosed in discovery. Although the declaration purports to be signed on April 16, 2017, Defendant

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<u>Evidence:</u>	<u>Objections:</u>
	Charlie Ferrara did not serve Plaintiffs with this document until after the close of business on July 7, 2017 – the same day that Charlie Ferrara was deposed.

DATED: August 7, 2017

HANSON BRIDGETT LLP

By: /s/ Samantha Wolff
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